UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

BENJAMIN BUTLER, CHERYLL RILEY CLAPPER, ANGELA COLLINS, CHARLES H. HOWARD, KAREN KASPER, JOEL PARRIS and JENNIFER TSONAS Plaintiffs, v. NEW-INDY CATAWBA, LLC d/b/a NEW-INDY CONTAINERBOARD and NEW-INDY CONTAINERBOARD, LLC Defendants.	)	Civil Action No. 0:22-cv-2366-SAL

COMPLAINT

Plaintiffs Benjamin Butler, Cheryll Riley Clapper, Angela Collins, Charles H. Howard, Karen Kasper, Joel Parris and Jennifer Tsonas ("Plaintiffs"), through undersigned counsel, file this Complaint against New-Indy Catawba, LLC d/b/a New-Indy Containerboard and New-Indy Containerboard, LLC (collectively "New-Indy" or "Defendants"), located at 5300 Cureton Ferry Road, Catawba, South Carolina ("the Facility") for violation of the Clean Air Act.

PARTIES

1. Plaintiffs, all of whom live from 2.76 miles to 8.29 miles of the Facility, are directly affected by, and suffer from, Defendants' emissions from the Facility. Plaintiffs' residential addresses are listed below:

Benjamin Butler: 4310 Coachwhip Avenue, Lancaster, South Carolina, 29720

Cheryll Riley Clapper: 7402 Twelve Mile Creek Road, Lancaster, South Carolina, 29720

Angela Collins: 3018 Ambleside Drive, Fort Mill, South Carolina 29707

Charles H. Howard: 5101 Samoa Ridge Drive, Lancaster, South Carolina 29720

Karen Kasper: 3103 Arches Bluff Circle, Lancaster, South Carolina 29720

Joel Parris: 3580 Penshurst Road, Rock Hill, South Carolina 29730

Jennifer Tsonas: 5101 Samoa Ridge Drive, Lancaster, South Carolina 29720.

2. In addition to Plaintiffs, undersigned counsel also represent approximately 1,800 similarly situated persons living within 30 miles of the Facility and its wastewater and sludge storage, treatment, and disposal facilities, who have similarly suffered health effects and disrupted lives due to Defendants' toxic and noxious air emissions from the Facility. All of these people own or lease their properties. These and other individuals are simultaneously pursuing a class action pending before this Court based on the grossly malodorous, toxic, and harmful air emissions and other pollutant releases from the Facility. *See White et al. v. New-Indy Catawba, LLC et al.*, Case No. 0:21-cv-1480-SAL; *see also Kennedy et al. v. New-Indy Catawba, LLC et al.*, Case No. 0:21-cv-01704-SAL.

3. Defendant New-Indy Catawba LLC, d/b/a New-Indy Containerboard, is a limited liability company organized under the laws of Delaware, with its main office in Catawba, South Carolina. It is registered to do business in South Carolina, and its registered agent is Corporation Services Company, 508 Meeting Street, West Columbia, South Carolina 29169.

4. Defendant New-Indy Containerboard, LLC is a limited liability company organized under the laws of Delaware with its main office in Ontario, California. New-Indy Containerboard, LLC is the parent of New-Indy Catawba LLC. Defendant New-Indy Containerboard, LLC's registered agent is CSC Lawyers Incorporating Services, 2710 Gateway Oaks Dr., Suite 150 N, Sacramento, CA 95833.

5. Defendants own and operate the Facility which produces pulp and paper and is located at 5300 Cureton Ferry Road, Catawba, York County, South Carolina. The Facility is a major stationary source of air pollutants because it has the potential to emit 100 tons per year or more of a regulated New Source Review pollutant as defined in S.C. Code Regs. 61- 62.5, Standard 7 and 40

CFR §52.21.

NATURE OF ACTION

6. This is a civil action brought against Defendants concerning the proposal to construct, and the construction of, a major modification to an existing major stationary source of air pollutants in an attainment area without the necessary Clean Air Act Prevention of Significant Deterioration ("PSD") permit, resulting in excessive emissions of total reduced sulfur ("TRS"), including hydrogen sulfide (H_2S), methyl mercaptan and other toxic air pollutants, from the Facility located in Catawba, York County, South Carolina.

7. Exposure to excessive TRS and H_2S causes various adverse health effects, such as headache, nausea, difficulty breathing among people with asthma, and irritation of the eyes, nose, and throat. Beginning approximately February of 2021, the Facility emitted excessive levels of H_2S with the result that there have been high levels of H_2S concentrations in the air at various locations on and off the Facility property, including in nearby residential communities, some of which were measured by EPA.

8. EPA and the South Carolina Department of Health and Environmental Control ("DHEC") have reportedly received over 35,000 complaints from residents living near the Facility—and even from residents living as far away as the southern suburbs of Charlotte, North Carolina—about noxious odors, nausea, eye, nose and throat irritation, migraines, and other symptoms.

JURISDICTION AND VENUE

9. This Court has jurisdiction over the subject matter of this action pursuant to Clean Air Act, 42 U.S.C. § 7604 (Citizen Suit) and 28 U.S.C. § 1331 (Federal question).

10. Venue is proper in this District pursuant to Clean Air Act, 42 U.S.C. § 7604 and 28 U.S.C. § 1391(b) and (c), because Defendants conduct business in this District, the Facility is located

in this District, the releases of TRS and H_2S occurred in this District, and the emissions and these and other substances continue to threaten residents of this District.

BACKGROUND

11. Defendants own and operate the Facility, a pulp and paper mill in Catawba, South Carolina.

12. Defendants shut down the Facility's manufacturing operations between September and November of 2020, to convert from producing white paper (bleached paper) to producing containerboard grade paper (unbleached brown paper referred to as linerboard used for making cardboard). As of February 2021, Defendants were operating the Facility again, and began emitting high levels of TRS and H_2S.

13. Approximately 1.7 million people live within a 30-mile radius of the Facility, in York, Lancaster, and Chester Counties in South Carolina, and Union and Mecklenburg Counties in North Carolina. The Facility is located approximately 10 miles south and southwest of Indian Land, South Carolina and Waxhaw, North Carolina, respectively. The Catawba Indian Nation Reservation is located less than 4 miles north of the Facility.

Impacts of Hydrogen Sulfide and TRS

14. Hydrogen sulfide is a flammable, colorless gas that smells like rotten eggs. People usually can smell H_2S in ambient air at concentrations ranging as low as 0.5 parts per billion (ppb). Elevated concentrations of H_2S can cause various adverse health effects, such as headache, nausea, difficulty breathing among people with asthma, and irritation of the eyes, nose, and throat. The Agency for Toxic Substances and Disease Registry has established an ambient Minimum Risk Level ("MRL") for H_2S of 70 ppb over a 24-hour averaging period.

15. TRS includes not only H_2S but also methyl mercaptan, methyl disulfide, and dimethyl disulfide. Methyl mercaptan is a noxious gas with a disgusting odor that adversely impacts

quality of life and is an irritant gas that can irritate mucus membranes in the respiratory system, eyes, and skin. Methyl mercaptan is designated as a toxic air pollutant by DHEC and considered 14 times more toxic than H_2S based on the levels considered acceptable at an emitter's property line. *See* S.C. Code Regs. 61-62.5, Standard No. 8, Toxic Air Pollutants. Methyl disulfide and dimethyl disulfide have a noxious odor described as a "stench" that adversely impacts quality of life and causes serious eye irritation and respiratory irritation.

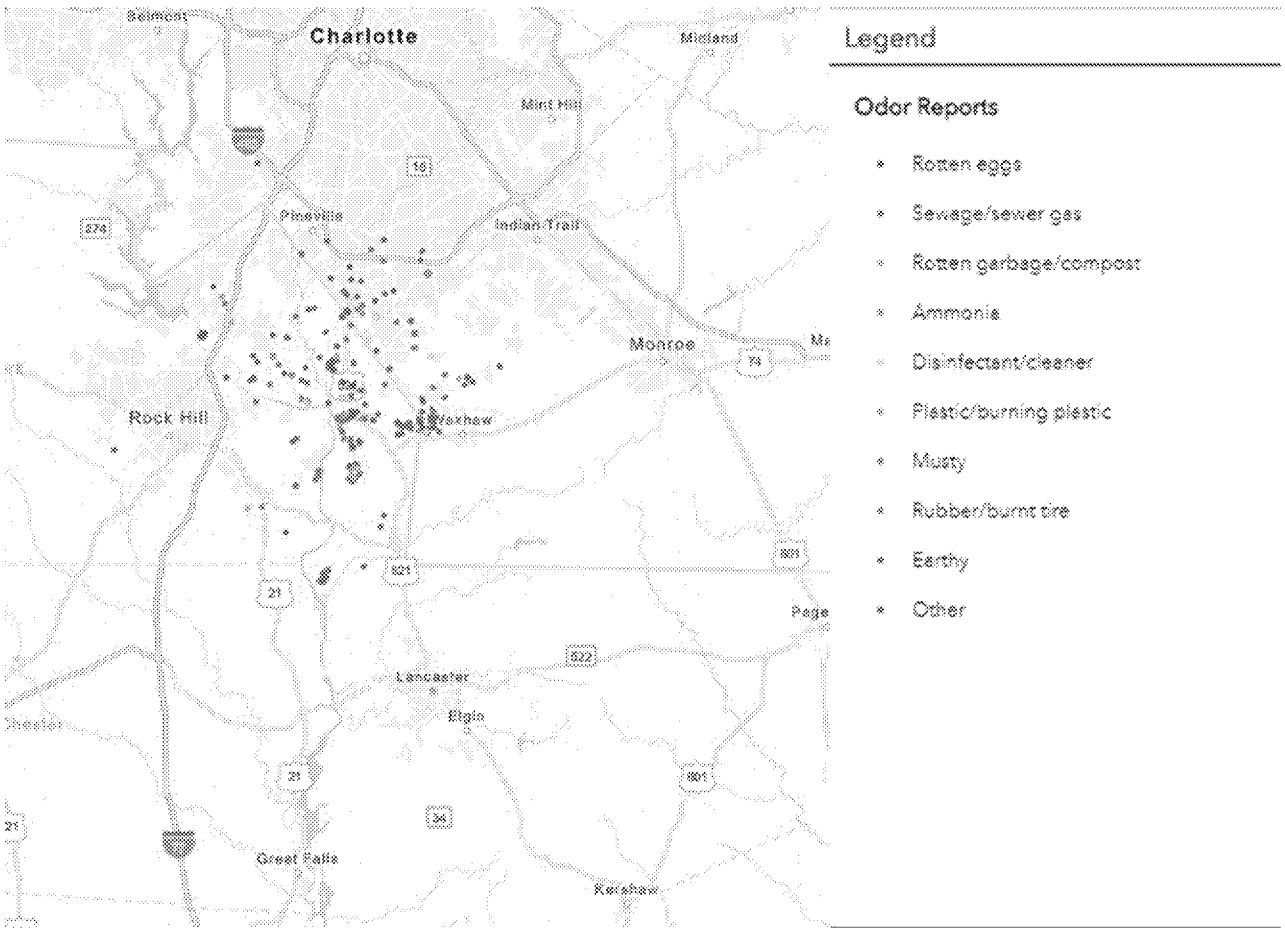
16. Residents in Fort Mill, Indian Land, Rock Hill, and Lancaster, South Carolina, and in Charlotte, Matthews, Pineville, and Waxhaw, North Carolina have complained of strong odors and reported health effects to DHEC. In the eight-week period from March 12, 2021 to May 7, 2021, DHEC's online reporting database received approximately 17,000 such complaints, some from residents living as far as 30 miles away from the Facility.

17. The reported health effects have included nausea, headaches including migraines, nose or throat irritation, and eye irritation. Less frequently reported symptoms include coughing, difficulty breathing, nose bleeds, asthma "flare ups," and dizziness.

18. Residents have also documented on DHEC's online database a wide range of impacts to quality of life, personal comfort, and well-being. This includes lost sleep, a desire to stay indoors to avoid odors, and stress and anxiety. For example, many residents noted that odors were noticeable inside their homes, that they were woken at night due to the odors, that they did not want to go outside due to the odors, and other symptoms.

19. EPA maintains a database to keep track of complaints submitted by residents who live near the Facility. During March and April of 2021, EPA logged hundreds of complaints. Some complaints reported odors and a subset included information on health impacts. The most frequently cited symptoms included in the EPA database were headache, burning eyes, nausea, and throat irritation. DHEC has updated its reporting of citizen complaints from 17,000 through May 2021 to

29,928 as of August 8, 2021. Citizen complaints continue to this day. DHEC's website includes the graphic excerpted below showing the location of reported complaints in the month of April 2022:



DHEC Investigations and Order

20. By April 9, 2021, DHEC was investigating the source of the reported odors. DHEC personnel reported experiencing off-site odors on Highway 5, as it crosses the Catawba River near the Facility, and in neighborhoods several miles away, in Rock Hill, Lancaster, and Indian Land, South Carolina. In April of 2021, DHEC conducted a trajectory analysis, which is an assessment of the location of an emitting source using odor complaints and wind direction. DHEC identified the Facility as the main, if not only, source of H_2S causing the symptoms that residents had reported in the surrounding communities. On May 7, 2021, DHEC issued Defendants a Determination of

Undesirable Levels and an Order to Correct Undesirable Level of Air Contaminants.

EPA Investigations

21. On April 15, 2021, EPA inspectors visited the Defendants' Facility. The inspectors wore gas monitors for personal safety. One of the monitors detected H_2S readings as high as 15,900 ppb.

22. From April 24 through 27, 2021, EPA inspectors also detected H_2S from on-site and nearby locations downwind of the Facility using a mobile laboratory called the Geospatial Measurement of Air Pollution ("GMAP"). EPA used the GMAP to perform stationary measurements of airborne H_2S at 15 locations. At several of the locations, the H_2S concentration exceeded the applicable National Research Council's Acute Exposure Guideline Level-1 ("AEGL-1"), a concentration above which it is predicted that the general population, including susceptible individuals, could experience notable discomfort or irritation.

23. In addition, EPA used the GMAP to collect 84 mobile transect air samples while the mobile lab was moving. Seven of the samples showed that H_2S concentrations at the Facility exceeded 1,000 ppb, and that concentrations generally decreased as the mobile lab got further away from the Facility.

24. The EPA personnel who conducted the GMAP sampling reported experiencing a distinct and strong odor while at the Facility and while conducting sampling in offsite areas, including Catawba Indian Nation Reservation, Indian Land, Riverchase Estates, and other surrounding communities. The EPA employees reported noticing odors at the same time as when the GMAP measured airborne H_2S and reported experiencing headaches, itchy eyes, and nausea while the odor was present, and when H_2S was being detected.

25. EPA met with and otherwise communicated with Defendants about these findings and about how to control H_2S emissions.

26. On May 13, 2021, EPA exercised its authority under Clean Air Act § 7603 and issued an administrative order (EPA Order) to Defendants, requiring Defendants to reduce their H_2S emissions, monitor and limit their emissions so as not to exceed certain ambient concentrations of H_2S outside the Facility, and to submit a long-term plan to control H_2S emissions in the future.

27. Despite Defendants' subsequent corrective actions, Defendants exceeded the fence-line concentration limits required by the EPA Order (70 ppb for a seven-day rolling average and 600 ppb for a 30-minute rolling average) on numerous occasions. Specifically, as of June 29, 2021, Defendants had reported the following exceedances at monitoring station 1:

Paragraph 52.b (70 ppb / 7 days)		**Paragraph 52.b (600 ppb / 30 minutes)**	
Date	**H2S Concentration**	**Date and Time**	**H2S Concentration**
May 26, 2021 – June 1, 2021	70.8 ppb	June 4, 2021, 7:00 - 7:30 pm	1,075 ppb
May 27, 2021 – June 2, 2021	81.2 ppb	June 4, 2021, 7:30 - 8:00 pm	1,329 ppb
May 28, 2021 – June 3, 2021	88.8 ppb	June 4, 2021, 8:00 - 8:30 pm	1,073 ppb
May 29, 2021 – June 4, 2021	110.8 ppb	June 4, 2021, 8:30 - 9:00 pm	607 ppb
May 30, 2021 – June 5, 2021	102.4 ppb	June 12, 2021, 2:30 – 3:00 pm	675.3 ppb
May 31, 2021 – June 6, 2021	71.8 ppb	June 14, 2021, 4:30 – 5:00 pm	1,330 ppb
June 7, 2021 – June 13, 2021	93.7 ppb	June 15, 2021, 2:00 – 2:30 pm	624.6 ppb
June 8, 2021 – June 14, 2021	108.4 ppb	June 15, 2021, 5:00 – 5:30 pm	676.6 ppb
June 9, 2021 – June 15, 2021	150.3 ppb	June 15, 2021, 5:30 – 6:00 pm	674.9 ppb
June 10, 2021 – June 16, 2021	177.7 ppb	June 20, 2021, 4:30 – 5:00 pm	812 ppb
June 11, 2021 – June 17, 2021	205.1 ppb	June 20, 2021, 5:00 – 5:30 pm	1,024 ppb
June 12, 2021 – June 18, 2021	207.1 ppb		
June 13, 2021– June 19, 2021	185.4 ppb		
June 14, 2021– June 20, 2021	153.5 ppb		
June 15, 2021– June 21, 2021	140.5 ppb		
June 16, 2021 – June 22, 2021	102.7 ppb		
June 17, 2021 – June 23, 2021	87.5 ppb		

PSD Violations

28. In April 2020, Defendants submitted a "minor" construction application (the "Application") to DHEC to obtain a construction permit that would allow Defendants to take their hazardous air pollutant steam stripper located within the Facility out of service and to construct a hard pipe to transport all of the process-generated foul condensate to the Facility's outdoor wastewater treatment system or plant ("WWTP"). This change was part of the larger conversion of

the Facility to brown paper production.

29. Because the Facility is an existing major source of air pollutants in an attainment area, the Application purported to demonstrate that the physical change to the Facility was "minor," meaning that it would not result in a net significant increase in any of the pollutants that are regulated under the CAA New Source Review requirements. If the change did result in a net significant increase of any regulated air pollutant, a PSD permit would have been required. 42 U.S.C. §7475. Such a permit imposes many obligations on the applicant, including potential modeling of the ambient impact of the increased emissions and other adverse impacts on the population, and application of Best Available Control Technology to control the emissions resulting from the change.

30. Defendants represented to DHEC that "the total volume of mill wastewater is . . . expected to be reduced by approximately 50% following conversion to unbleached pulp production." *See* Ex. 1, Application at 2-1. Upon information and belief, Defendants assumed this fact as true in estimating future emissions, after installation of the hard pipe and elimination of the steam stripper. Reduction in Facility wastewater volume would have reduced the volume of toxic components and toxic emissions volatilizing from the foul condensate.

31. Contrary to Defendants' representations to DHEC, the discharge monitoring reports to DHEC show that Defendants did not reduce its wastewater flow as promised in its Application. In 2019 and 2020, before the conversion, the monthly average discharge rate was 19.7 million gallons a day ("MGD") and 22.2 MGD, respectively. After the conversion, reported by Defendants to have been completed February 1, 2021, the monthly average discharge rate from the mill to the WWTP through June 2021 has been 19.4 MGD. *See* Ex. 2, Expert Report of Kenneth L. Norcross at pgs. 9-10 ("Norcross Report"). On information and belief, Defendants' wastewater discharge rate has averaged approximately 22.8 MGD between June 2021 and May 2022. As a result, Defendants'

emission calculations relying on reduced wastewater volume were false.

32. Defendants' application for a minor construction permit also falsely represented the level of removal of toxic air pollutants that would occur when the foul condensate was exclusively piped to its outdoor wastewater treatment plant, including its Aerated Stabilization Basin ("ASB"). Defendants represented that they had calculated "the change in emissions from the wastewater treatment system due to the new hard pipe . . . using emission models from NCASI for H2S." *See* Ex. 1, Application at 3-1. Defendants claimed that "by treating the foul condensates using hard pipe, more than 96% of the [hazardous air pollutants] and 94% of the TRS compounds would be removed biologically in the wastewater treatment system."

33. In the April 2020 Application, Defendants represented that its Baseline Actual Emissions were 147.2 tons per year ("tpy") of TRS and 9.7 tpy of H_2S. Defendants further represented that the physical changes and changes in operation from which they sought to be authorized would result in a net increase of 6.9 tpy of TRS and 2.2 tpy of H_2S over its baseline emissions of these pollutants. Because the net increases were less than the federal regulatory threshold of 10 tpy, Defendants sought and obtained findings by DHEC that the deactivation of the steam stripper and reliance on the wastewater treatment system was a "minor" change that did not require a PSD permit and was exempt from a demonstration of compliance with South Carolina toxic air pollutant regulations governing H_2S and methyl mercaptan (a component of TRS). Defendants also sought a determination that they were not required to have permit limits for TRS and H_2S relating to these changes. *See* Ex. 1, Application at 4-3; S.C. Code Regs. 61-62.7, Standard 7(b)(49).

34. Application of the NCASI model depended on a properly operating wastewater system. However, when Defendants started the Facility up in February 2021, the WWTP, including the ASB, was in a poor state of repair and could not remove the H_2S and TRS that were released to

the ambient air and the surrounding communities. *See* Ex. 2, Norcross Report at pgs. 2-3, 7-8. Defendants now admit that the inputs used in the NCASI model were based on the status of the wastewater treatment system in *2015*, instead of the state of disrepair in early 2021. Defendants knew or should have known that its wastewater treatment system did not function properly. *See* Ex. 2, Norcross Report at pgs. 2-3, 5-11, 16-20. As a result, the removal percentages for H_2S and TRS that Defendants submitted to DHEC were false and misleading.

35. In its July 12, 2021 Corrective Action Plan (the "CAP"), Defendants admit that the ASB was filled with fiber and sludge and had only 38 of 52 aerators operating (*see* Ex. 3, CAP at 5-5) with as few as 28 aerators functioning as late as a month prior. As a result, Defendants could not adequately treat the TRS in the foul condensate and H_2S and other toxics volatized to the ambient air and were carried by the wind to residential communities many miles away. As Defendants now acknowledge:

> After the conversion and restarting the mill . . .the thick layer of fiber formed on the basin reducing the aeration capacity of the basin. This reduced aeration capacity and sludge accumulation that has reduced mixing and disruption of the flow path through the basin have hindered the basin's ability to perform as modeled. The two main operational issues in the Aeration Stabilization Basin that pose the potential of causing or contributing to elevated levels of hydrogen sulfide have been the formation of the floating fiber layer and the accumulation of settled solids.

Ex. 3, CAP at 7-5.

36. When Defendants represented to DHEC that the Facility's emissions of TRS and H_2S—dangerous hazardous air pollutants—would not be "significant" and should be exempted from PSD and a toxics compliance demonstration, it did so on the basis of predicted wastewater volume that did not occur and "modeled" emissions that failed to account for its inadequate wastewater treatment system.

37. Through these misrepresentations, Defendants bypassed the Facility's inoperable steam stripper and proceeded to hard-pipe foul condensate outdoors to its treatment system that was

in disrepair, with the result that it blanketed the surrounding residential areas with dangerous and malodorous air pollutants, including TRS, as well as methyl mercaptan and H_2S, both of which are categorized as "toxic air pollutants" by DHEC. *See* S.C. Code Regs. 61-62.5, Standard No. 8, Toxic Air Pollutants. Despite these known failures, Defendants ran the Facility at or near full capacity, generating foul condensate and wastewater that its WWTP was incapable of handling. *See* Ex. 2, Norcross Report at p. 2.

38. Defendants' gross air emissions released to the downwind communities led to the complaints to DHEC and EPA detailed below. Three months after startup of the new linerboard process, Defendants were required to restart its steam stripper to treat foul condensate, but it lacks the capacity to treat all the foul condensate with steam stripping inside the Facility and continues each day to discharge as much or more than 300,000 gallons of the toxic and malodorous foul condensate to the inadequate wastewater treatment system. TRS, as well as other chemical constituents in the foul condensate and the chemical additives Defendants are introducing to the WWTP, continue to be released to the ambient air and the surrounding communities. *See* Ex. 2, Norcross Report at pgs. 2-3.

39. Although Defendants represented to DHEC that the net emissions increase from its changes to the Facility would be 6.9 tons per year of TRS and 2.2 tons per year of H_2S, and thus below the regulatory threshold of 10 tons per year, Defendants should have known that the physical change of hard-piping foul condensate to the outdoor wastewater treatment system would result in substantially higher emissions of TRS and H_2S because of inadequate treatment. Defendants exceeded the 10 ton per year threshold for both TRS and H_2S and were required to obtain, but failed to obtain, a Clean Air Act PSD Permit.

40. Dr. Steven Hanna, Plaintiffs' air dispersion modeling expert, has determined using back-calculations and reverse modeling from EPA's ambient air monitoring data on four days in

April 2021 that the actual H_2S emissions from Defendants' Facility on those days exceeded 15 tons *per day*. Defendants had operated in this mode for at least 90 days prior to the EPA monitoring. During this period, Defendants emitted more than 1000 tons of H_2S, thereby grossly exceeding the regulatory threshold of a 10 ton *per year* net increase in H_2S over the represented baseline emissions of 9.7 tons *per year* from the Facility. That triggers the obligation to obtain a PSD permit. 42 U.S.C. §7475. Defendants have represented that H_2S is approximately 10% of the Facility's TRS emissions (Ex. 3, CAP at p. 6-12, Table 6-1), and with that information it can be inferred that the Facility has emitted thousands of tons of TRS. Thus, Defendants also grossly exceeded the regulatory threshold of a 10 ton per year net increase of TRS over the represented baseline emissions of 147.2 tpy. *See* Ex. 1, Application at 4-4.

41. Plaintiffs file this action seeking injunctive relief under Clean Air Act, § 7604 requiring Defendants to apply for and obtain a PSD permit and restraining Defendants from emitting excessive TRS and H_2S and/or requiring Defendants to take immediate steps, including a cessation or significant reduction in the amount of foul condensate discharged to the WWTP and to eliminate the air pollution that is presenting an imminent and substantial endangerment to the public health or welfare.

CLAIM FOR RELIEF

COUNT I
Injunctive Relief and Penalties under 42 U.S.C. §7604(a)(3) Constructing and Proposing to Construct a Major Modification without a Required PSD Permit

42. All foregoing Paragraphs are realleged and incorporated herein by reference.

43. Congress enacted the Clean Air Act "to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare and the productive capacity of its population." 42 U.S.C. § 7401(b)(1).

44. Clean Air Act § 7602(g) defines an "air pollutant" as "any air pollution agent or

combination of such agents, including any physical, chemical . . . substance or matter which is emitted into or otherwise enters the ambient air." 42 U.S.C. § 7602(g). At all times relevant to the Complaint, H_2S has been an "air pollutant" within the meaning of 42 U.S.C. § 7602(g), because it is a chemical substance that is emitted to the air from the Facility.

45. Clean Air Act §7602(e) defines "person" to include individuals, corporations, partnerships and associations. 42 U.S.C. § 7602(e). Both Defendants are persons because they are limited liability companies.

46. Defendants' construction of a hard pipe and deactivation of its steam stripper should have been predicted to result in a net significant increase in emissions of TRS and H_2S.

47. Defendants were required to obtain and failed to obtain a Clean Air Act PSD permit to allow construction.

48. Defendants proposed to construct and constructed a major modification to a major stationary source of pollutants in an attainment area without the permit required under part C of subchapter I (relating to significant deterioration of air quality) and is subject to injunctive relief and penalties through the citizen suit provision of the Clean Air Act, 42 U.S.C. §7604(a)(3).

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court provide the following relief:

1. Order Defendants to immediately take all measures necessary to eliminate the imminent and substantial endangerment posed by TRS and H_2S emissions from the Facility;

2. Order Defendants to reduce pulp production to the extent necessary to avoid piping foul condensate to the ASB until Defendants apply for and obtain a PSD Permit with all of its requirements relating to the impacts and control of TRS and H_2S, including application of Best Available Control Technology;

3. Order Defendants to conduct such monitoring and reporting as necessary to confirm that TRS and H_2S emissions are adequately reduced at the fence-line and in the community;

4. Assess and require Defendants to pay all maximum civil penalties set forth in the Clean Air Act, whether per pollutant, per violation, and/or per day, as a result of Defendants' violation of the Clean Air Act;

5. Award Plaintiffs the cost of litigation, including reasonable attorneys' fees and expert witness fees;

6. Award such other and further relief that the Court deems just and proper.

July 22, 2022

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